## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

IN THE MATTER OF:	)			
United States of America,	)	Case No:	2:24-mj-183	
Dennis David Stopar	)			
72491 Flushing Holloway Road Flushing, Ohio 43977	) )	MAGISTR	ATE JUDGE:	Vascura

### AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Andrew D. McCabe, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, hereby depose and state:

#### INTRODUCTION

- 1. I, Special Agent Andrew McCabe (your affiant), make this affidavit in support of a criminal complaint to arrest Dennis David STOPAR for violations of Title 18 United States Code §§ 2251, 2252, and 2252A the sexual exploitation of a minor and the distribution, receipt, and/or possession of child pornography. The statements contained in this affidavit are based in part on information and analysis provided by law enforcement agents; written reports about this and other investigations that I have received, and your affiant's personal knowledge and finding during the investigation. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that STOPAR committed the violations listed above.
- 2. Your affiant has been an FBI Special Agent since September 2010, and I have been assigned to the Cincinnati Division since January 2020. During my tenure as an FBI Special Agent, I have investigated numerous crimes including, but not limited to, bank robbery, drug trafficking, racketeering, kidnapping, violent extremism, and crimes against children. As a Special Agent I have participated in various investigations involving computer-related offenses and have executed search warrants, including those involving searches and seizures of computers, digital media, software, and electronically stored information. As a SA, I am authorized to investigate violations of the laws of the United States under the authority of the United States.

#### FACTS SUPPORTING PROBABLE CAUSE

3. On or about December 8, 2023, a CyberTipline report was submitted to the National Center for Exploited Children (NCMEC) by Dropbox, Inc. regarding the uploading of child pornography to the Dropbox account associated with Screen/User Name A.P. and email account andrewpierce802@gmail. According to the information that was provided by

Dropbox, on November 13, 2023, three separate files depicting child pornography were uploaded via the "Andrew Pierce" Dropbox account. The CyberTipline report indicated all three files were identified using the MD5 hash matching method<sup>1</sup>. Copies of the child pornography files were included with the CyberTipline report along with information pertaining to the IP address utilized to access the account at the time the suspect files were uploaded. For example, one video which depicted a prepubescent girl dancing around, pulling up her shirt to just below her breast area and pulling down her shorts to just the top of her buttocks. Another video depicted a prepubescent girl posing in provocative positions, taking off her shorts, then underwear and eventually spreading her legs open and exposing her bare vagina to the camera before pulling apart her labia to expose her vaginal opening.

- 4. Additionally, Dropbox identified the IP address 2601:548:8380:980:507f:ae34:4782:d242 as being used to log into the Dropbox account on November 14, 2023 which was within 24 hours of when the child pornography had been uploaded into the account.
- 5. Law enforcement served legal process to Comcast, the service provider that the above noted IP address resolved to. In December 2023, in response to that request, Comcast identified the subscriber of IP address 2601:548:8380:980:507f:ae34:4782:d242 as Roxane Pierce, with a service address of 72491 Flushing Holloway Road, Flushing, Ohio, which is located in Belmont County in the Southern District of Ohio.
- 6. During the investigation, BCSO learned that seven minor children resided in the residence at 72491 Flushing Holloway Road. In addition, they learned through law enforcement databases that **STOPAR** also resided at that location as well. Further checks revealed STOPAR was a Tier III registered sex offender based on a prior rape conviction. **STOPAR** had previously been found guilty of Rape in violation of ORC Section 2907.02(A)(2) and one count of Endangering Children in violation of ORC Section 2919.22(B) in the Summit, Ohio Court of Common Pleas on December 12, 1995.
- 7. On or about December 28, 2023, law enforcement with BCSO executed a state search warrant that had been issued by the Belmont County Court, Western Division. The warrant was for the residence of 72491 Flushing Holloway Road, Flushing, Ohio and, more specifically, authorized the search of the residence and other structures on the property and the seizure of all electronic devices present to include cellular telephones. This included item having access to the internet service provided at the above-listed IP address.
- 8. During the search warrant execution, BCSO detectives seized a Samsung S21 Cellular telephone belonging to **STOPAR**. **STOPAR**, who was present during the search, provided detectives the password to the Samsung phone. During a precursory review of the Samsung phone, law enforcement located three images in the recycle folder of **STOPAR**'s device. Law enforcement on scene noted the images depicted a prepubescent female naked from the

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<sup>&</sup>lt;sup>1</sup> A hash value is "an algorithmic calculation that yields an alphanumeric value for a file." *United States* v. *Stevenson*, 727 F.3d 826, 828 (8<sup>th</sup> Cir. 2013). Hash values have been referred to as a "unique digital fingerprint," *United States* v. *Sosa-Pintor*, 741 Fed. Appx. 207 (5<sup>th</sup> Cir. 2018), and are "regularly used to compare the contents of two files against each other." *United States* v. *Reddick*, 900 F.3d 636, 637 (5<sup>th</sup> Cir. 2018). Because only two identical files will return the same hash value, both law enforcement and private cloud storage companies use hash matching to identify and attempt to thwart the spread of child pornography material on the internet. *Id.* at 637-638.

waist down with her legs spread apart engaged in the lascivious exhibition of her genitalia. The Samsung cellphone of **STOPAR** was seized and law enforcement on scene used a cellular phone belonging to a BCSO detective to capture two of the three images which are described as followed:

- a. <u>Image One</u>: depicted a prepubescent female minor with her face visible wearing a black T-shirt with a picture of Bart Simpson on the front. The female minor was laying on a bed covered with a black sheet with a blue geometric design. The minor's legs are spread in a manner to display her nude vagina. The metadata noted the image was created using a Samsung SM-G988U on or about September 30, 2023;
- b. <u>Image Two:</u> depicted the same prepubescent female minor as seen in image one with her face visible again. The image is almost identical but slightly different in the way minor female's legs are positioned which again displayed her nude vagina. The metadata noted the image was created using a Samsung SM-G988U on or about September 30, 2023.
- 9. During the investigation, law enforcement identified the minor female depicted in the images as Minor Victim One (MV1), an approximately 12-year-old female, born in November 2011, and resided in the residence with **STOPAR** at the time of the search.
- 10. On or about December 29, 2023, **STOPAR** was arrested by BCSO and charged with six counts of Pandering Obscenity Involving a Minor in violation of Ohio Revised Code (ORC) section 2907.321.
- 11. On or about January 4, 2024, a forensic interview was conducted with MV1. During the interview, MV1 stated that STOPAR was related to her and lived in a trailer behind the residence. MV1 confirmed that when she was approximately eleven years old, MV1 was sitting on a bed in STOPAR'S trailer. At that time, STOPAR removed her pants and underwear and told MV1 to spread her legs. According to MV1, STOPAR then used his cellular phone to take pictures of her vagina. STOPAR then told MV1 not to tell anyone what happened.

#### CONCLUSION

12. Based upon the above information, your affiant submits there is probable cause to believe Dennis David **STOPAR** has committed violations of Title 18 U.S.C. §§ 2251, 2252, and 2252A – the sexual exploitation of a minor, distribution, receipt, and/or possession of child pornography. Therefore, your affiant respectfully requests this court to issue a criminal complaint and arrest warrant.

Andrew D. McCabe

Special Agent

Federal Bureau of Investigation

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Sworn to and subscribed before me this 8th day of March 2024.

April

The Honorable Chelsey M. Vascura

United States Magistrate Judge

United States District Court

Southern District of Ohio